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*Application granted on  
consent.*

April 26, 2024

SO ORDERED:  
Date: 4/30/24

*Richard H. Berman*  
Richard M. Berman, U.S.D.J.

### BY ELECTRONIC MAIL

Honorable Richard M. Berman  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re: United States v. Keonne Rodriguez,  
24 Cr. 082 (RMB)**

Dear Judge Berman:

We write on behalf of Keonne Rodriguez, the defendant in the above-referenced matter. Mr. Rodriguez is directed to appear for an initial presentment at 9:00 a.m. on Monday, May 29, 2024.<sup>1</sup> Given that Mr. Rodriguez resides in the Western District of Pennsylvania, we respectfully request that he be permitted to travel to Newark, NJ on Sunday, May 28, 2024 and stay in a hotel in advance of his initial presentment. We have conferred with the Government and Pretrial Services, each of whom has no objection to this request.

If the Court is inclined to grant the requested relief, Mr. Rodriguez will provide Pretrial Services with his itinerary, including hotel information in advance of travel. The undersigned are available to answer any questions the Court may have.

Respectfully submitted,

Sean S. Buckley  
Michael Keilty  
212-488-1200

cc: AUSA David Felton

<sup>1</sup> Kobre & Kim LLP is assisting Mr. Rodriguez and intends to appear on Mr. Rodriguez's behalf on Monday, May 29, 2024, for purposes of the initial appearance and bail only. The firm is discussing with Mr. Rodriguez the terms of a potential engagement in this matter.